

BakerHostetler

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Erica Barrow Clark
direct dial: 212.589.4273
ebarrow@bakerlaw.com

April 1, 2025

VIA ECF

Honorable Jeanette Vargas
United States District Judge
Southern District of New York
500 Pearl St. New York, NY 10007-1312

Re: Shanell Dean et al. v. New York Blood Center, Inc. et al. Case No. 1:25-cv-01051

Dear Honorable Vargas:

We represent Defendants New York Blood Center, Inc. and Memorial Blood Centers in the above captioned action. We write jointly along with counsel for Plaintiffs Shanell Dean, Jackie De Leon-Wallin, and Allison Storchevoy pursuant to Rule 3.E and 5.B of Your Honor's Individual Rules, to request that the Court issue a stay pending the parties' completion of a private mediation of all claims in this matter scheduled for June 27, 2025 before Hon. Diane M. Welsh (ret.) at JAMS.

This Court recently granted Plaintiffs' motion to consolidate. *See* ECF Doc. 17. As a result, Plaintiffs filed their consolidated amended complaint. *See* ECF Doc. 20. The parties' deadline to file a joint letter and proposed civil case management plan and scheduling order is on April 2, 2025. The initial pre-trial conference is scheduled for April 9, 2025. Lastly, Defendants' deadline to respond to the consolidated amended complaint is April 28, 2025.

The Parties believe that the interests of justice and judicial economy would be well-served by staying proceedings in this matter. In order to focus on the forthcoming mediation and avoid unnecessary expenditure of resources in the event the matter is successfully resolved without Court intervention, the Parties believe it is in their mutual best interest (and that of the putative class) to stay the matter through mediation. This request is made in good faith for purposes of settlement and mediation and is not intended to unnecessarily delay the proceedings.

Honorable Jeanette Vargas
April 1, 2025
Page 2

The Parties therefore respectfully request that the above referenced deadlines and initial pre-trial conference be held in abeyance through and including June 28, 2025 and to a further extension through July 28, 2025 for Defendants to respond to the Complaint in the event that this action is not resolved. The Parties will notify the Court in a timely manner regarding the outcome of the mediation. This is the parties first request for a stay of this matter.

For the foregoing reasons, the Parties respectfully request that the Court grant the requested stay.

Respectfully submitted,

SHAMIS & GENTILE, P.A.

BAKER & HOSTETLER LLP

By: /s/ Andrews J. Shamis

By: /s/ Erica A. Barrow

14 NE 1st Avenue, Suite 705
Miami, FL 33132
Tel.: (305) 479-2299
ashamis@hamisgentile.com

45 Rockefeller Plaza, 15th Fl.
New York, NY 10111
Tel.: (212) 589-4273
ebarrow@bakerlaw.com

Attorneys for Plaintiffs

Attorneys for Defendants